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April 2, 2025

Via ECF
US DISTRICT COURT, EDNY
Hon. Cheryl L. Pollak, USMJ
225 Cadman Plaza East
Brooklyn, NY 11201

> Re: Edmonson*, et al* v Raniere, *et al*
> Docket No: 20 CV 485 (EK)(CLP)

Dear Honorable Madame:

I represent Defendant KEITH RANIERE in the above-referenced matter. Please accept this correspondence as notice of my unavailability for tomorrow's phone-conference scheduled in the above-referenced matter

I am engaged in the jury trial of **Orozco v Alfonso, 717397/2019** before Hon. Claudia Lanzetta, JSC in Supreme Court, Queens County. As a result I will not be able to attend the phone conference regarding discovery. However, as indicated in previous scheduling correspondence between the parties and the court, Mr. Raniere and I hereby consent to any of my co-defense counsel appearing in my stead for this phone conference only.

I have been actively participating with all counsel in our discussions of drafting scheduling order, ESI agreement and general preparations for the discovery process herein. Accordingly, I have no concerns about any of my defense colleagues covering in my absence.

Thank you for your time and consideration. Please feel free to contact the undersigned with any further questions, concerns or directives.

Respectfully submitted,

Aaron M. Goldsmith

TO:

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All counsel/parties via ECF only